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July 31, 2019

## **VIA ECF**

The Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl St., Courtroom 24A  
New York, NY 10007

Re: Kaur v. Deutsche Bank A.G., et al.; Case No. 19-cv-02505 (CM)

Dear Judge McMahon:

We represent Plaintiff in the above-referenced matter and write pursuant to Your Honor's Individual Rule IV(C) to seek an order of reference to the Magistrate Judge for assistance in resolving early discovery disputes that have arisen between the parties. In particular at this juncture, the parties have been unable to resolve disagreements with respect to a confidentiality stipulation and protective order which Plaintiff's counsel has been told will be necessary to have in place for Defendants to produce documents.

Respectfully Submitted,



David E. Gottlieb

cc: Counsel of record *via* ECF